

EXHIBIT 3

[Chart comparing *Granuflo* and NECC proposals]

Comparison – Granuflo and Competing NECC Proposals

	<u>Granuflo</u>	<u>NECC Proposed Deadlines (TN Clinic Defendants)</u>	<u>NECC Proposed Deadlines (PSC)</u>
Master Complaint filed	12/20/13 ¹	11/5/13	11/5/13
Initial discovery order entered	10/1/13 ²	9/18/14 ³	9/18/14
Order regarding fact sheets entered	12/6/13 ⁴	Approved 2/18/14; final version filed 7/17/14	Approved 2/18/14; final version filed 7/17/14
Bellwether protocol entered	4/8/14 ⁵	~8/18/15	No bellwether process used
Case-specific discovery completed	9/29/15 ⁶	9/1/16	Not addressed
First bellwether trial	1/11/16	12/1/2016	12/4/15
//////////	//////////	//////////	//////////
<u>Time from entry of plaintiff fact sheet to first bellwether trial</u>	<u>25 months</u>	<u>28.5 months</u>	<u>16.5 months</u>
<u>Time from initial discovery order to first bellwether trial</u>	<u>27 months</u>	<u>26.5 months</u>	<u>14.5 months</u>

¹ Dkt. 467-1.

² Dkt. 334.

³ In the NECC litigation, after the filing of the Master Complaint, complicated motions to dismiss were filed testing the sufficiency of the claims against the clinic defendants. Additionally, Judge Saylor recused himself in February 2014, and much of the litigation was stayed while NECC and other parties attempted to settle the claims against them in global fashion through the bankruptcy court. Ultimately, after the motions to dismiss were ruled upon in August 2014, a discovery order was entered on 9/18/14.

⁴ Dkt. 441.

⁵ Dkt. 583.

⁶ Dkt. 635.